

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re CONVERIUM HOLDING AG
SECURITIES LITIGATION,

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:

No. 04 Cir. 7897 (DLC)

:

This document relates to:

:

ALL ACTIONS

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DECLARATION OF MARY EATON

MARY EATON hereby declares and states:

1. I am a member of the Bar of this Court and a member of the firm of Willkie Farr & Gallagher LLP, counsel for defendants SCOR Holding (Switzerland) AG (f/k/a Converium Holding AG) ("Converium"), Dirk Lohmann and Martin Kauer. I submit this declaration in Support of Defendants' Opposition To Lead Plaintiffs' Motion for Class Certification.

Analyst Reports

2. Attached hereto as Exhibit 1 is a true and correct copy of a report published by HSBC Investment Bank plc, entitled "Converium: Zurich Re in all but name," dated December 13, 2001.

3. Attached hereto as Exhibit 2 is a true and correct copy of a report published by Citigroup Global Markets Inc., entitled "Converium (CHRN.S): Downgrading Recommendation," dated February 18, 2004.

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4. Attached hereto as Exhibit 3 is a true and correct copy of a report published by Deutsche Bank AG, entitled "Converium: Walking the plank," dated February 19, 2004.

5. Attached hereto as Exhibit 4 is a true and correct copy of a report published by Citigroup Global Markets Inc., entitled "Converium (CHRN.S): 1Q04 Results," dated April 29, 2004.

6. Attached hereto as Exhibit 5 is a true and correct copy of a report published by Crédit Agricole Cheuvreux, entitled "Europe: Insurance," dated July 20, 2004.

7. Attached hereto as Exhibit 6 is a true and correct copy of a report published by Commerzbank AG, entitled "Trade Week: It's a mini adventure," dated July 20, 2004.

8. Attached hereto as Exhibit 7 is a true and correct copy of a report published by Natexis Bleichroeder Inc., entitled "Reserve strengthening plus a capital increase: disastrous effects guaranteed!" dated July 20, 2004.

9. Attached hereto as Exhibit 8 is a true and correct copy of a report published by Bear Stearns & Co. Inc., entitled "Converium (CHRN.S-SFr33) - Peer Perform: Lack of Visibility - Cautious Stance," dated July 21, 2004.

10. Attached hereto as Exhibit 9 is a true and correct copy of a report published by Citigroup Global Markets Inc., entitled "Converium (CHRN.S): Reserve increase saps management credibility," dated July 21, 2004.

11. Attached hereto as Exhibit 10 is a true and correct copy of a report published by Lombard Odier Darier Hentsch, entitled "Drastic Reserve Strengthening By Up To USD 400 MN: Rating Cut to Reduce, New Price Target of CHF 30," dated July 21, 2004.

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12. Attached hereto as Exhibit 11 is a true and correct copy of a report published by Merrill Lynch, Pierce, Fenner & Smith Inc., entitled "Dropping a Bombshell," dated July 21, 2004.

13. Attached hereto as Exhibit 12 is a true and correct copy of a report published by Morgan Stanley & Co. Inc., entitled "Downgrading - Too Many Uncertainties," dated July 21, 2004.

14. Attached hereto as Exhibit 13 is a true and correct copy of a report published by Pictet & Cie, entitled "Renewed Bolstering of Reserves - An Even Smaller Cap Now," dated July 21, 2004.

Press Releases

15. Attached hereto as Exhibit 14 is a true and correct copy of a press release issued by Converium, dated July 20, 2004.

16. Attached hereto as Exhibit 15 is a true and correct copy of a press release issued by Converium, dated August 31, 2004.

17. Attached hereto as Exhibit 16 is a true and correct copy of a press release issued by Converium, dated September 2, 2004.

Court-Filed Documents

18. Attached hereto as Exhibit 17 are true and correct excerpts of the First Amended Class Action Complaint filed in *Meyer v. Converium Holding AG*, Civ. A. No. 04-CV-07897 (MBM) (S.D.N.Y.), dated October 15, 2004.

19. Attached hereto as Exhibit 18 are true and correct excerpts of the "Memorandum Of Law In Further Support Of The Motion Of Public Employees' Retirement System Of Mississippi And In Reply To The Opposition Of The Avalon/Schmieder Group,"

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filed in *In re Converium Holding AG Securities Litigation*, 04 Civ. 7897 (DLC) (S.D.N.Y.), dated December 30, 2004.

20. Attached hereto as Exhibit 19 are true and correct excerpts of “Lead Plaintiffs’ Memorandum of Law In Opposition To All Defendants’ Motions To Dismiss The Consolidated Amended Class Action Complaint,” filed in *In re Converium Holding AG Securities Litigation*, 04 Civ. 7897 (DLC) (S.D.N.Y.), dated February 17, 2006.

21. Attached hereto as Exhibit 20 are true and correct excerpts of the “Memorandum Of Law In Support Of Lead Plaintiffs’ Motion For Reconsideration,” filed in *In re Converium Holding AG Securities Litigation*, 04 Civ. 7897 (DLC) (S.D.N.Y.), dated January 12, 2007.

22. Attached hereto as Exhibit 21 is true and correct copy of “Affidavit of Todd B. Hilsee on International Partial Settlement Notice Plan,” submitted to the Court in chambers in *In re Converium Holding AG Securities Litigation*, 04 Civ. 7897 (DLC) (S.D.N.Y.) on October 12, 2007.

23. Attached hereto as Exhibit 22 is true and correct copy of “Declaration of Andrea Sabbatini, Avocat à la Cour, In Support of Lead Plaintiffs’ Renewed Motion for Class Certification,” filed in *In re Parmalat Securities Litigation*, 04 MD 1653 (LAK) (S.D.N.Y.), dated December 8, 2006.

Transcripts

24. Attached hereto as Exhibit 23 are true and correct excerpts of the transcripts of the status conference before the Hon. Denise L. Cote, held January 25, 2007.

25. Attached hereto as Exhibit 24 are true and correct excerpts of the deposition of Elli Kioupi, taken October 4, 2007.

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26. Attached hereto as Exhibit 25 are true and correct excerpts of the deposition of Ioannis Papaioannou, taken October 5, 2007.

27. Attached hereto as Exhibit 26 are true and correct excerpts of the deposition of Anuradha Venkataraman, taken October 16, 2007.

Offering Documents

28. Attached hereto as Exhibit 27 are true and correct excerpts of "Securities and Exchange Commission Form F-1 Registration Statement Under the Securities Act of 1933 for Converium Holding AG," dated November 19, 2001.

29. Attached hereto as Exhibit 28 are true and correct excerpts of "Prospectus: 35,000,000 Shares, Converium Holding AG in the form of Shares or American Depositary Shares," dated December 10, 2001.

I declare, on the basis of personal knowledge and under penalty of perjury, that the statements contained herein are true and correct.

Dated: October 19, 2007

M. Eaton.

Mary Eaton